

**CONTINUATION IN SUPPORT OF AN APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

1. I am a Special Agent with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS). I have been employed as a Special Agent for HSI since August 2020. I successfully completed the Criminal Investigator Training Program (CITP) and the HSI Special Agent Training (HSISAT) at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA. Prior to joining HSI, I was a Border Patrol Agent (BPA) with the United States Border Patrol (USBP) in Eagle Pass, Texas. Additionally, I have received a bachelor's degree in criminal justice from Madonna University. While employed at HSI, I have investigated federal criminal violations related to child sex trafficking, child exploitation, and child pornography. I have received training on child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Julius Samuel JOHNSON violations of 18 U.S.C § 2252A(a)(2) (distribution and receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by

other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for JOHNSON.

4. During an HSI investigation regarding child exploitation and child pornography offenses in the Eastern District of Michigan, agents reviewed a cell phone belonging to an individual whose identity is known to law enforcement (Subject-4). Agents found chats on an internet-based messaging application between Subject-4 and an individual using the name “Jay.” Within the chat, “Jay” identified a cell phone number for himself, which based on law enforcement databases is associated with JOHNSON. Also in the chat, JOHNSON confirms his full name and provided multiple photographs of himself. Law enforcement compared these photographs to Michigan Secretary of State records of JOHNSON’s Michigan driver’s license photograph, and this appears to be the same individual.

5. Review of the chats between JOHNSON and Subject-4 also shows that JOHNSON received child pornography from Subject-4, that JOHNSON may have

sexually abuse children and produced child pornography, and that JOHNSON has a violent, sexual interest in children. Much of this exchange appears to have occurred before JOHNSON turned 18 years old.

6. For example, when reviewing media shared between the two users via Telegram, there is one file that appears to have been sent from Subject-4 to JOHNSON on or about June 1, 2024. The video is approximately 1 minute and six seconds in length and depicts a naked prepubescent male being anally penetrated by an adult male penis. The adult male ejaculates and then digitally penetrates the child's anus.

7. With regards to JOHNSON sexually abusing children, there is an exchange on or about July 31, 2024. JOHNSON tells Subject-4 that he is at his grandmother's in Missouri and discusses having access to a 6-year-old child. It appears that JOHNSON may have produced a video of the abuse and sent it to Subject-4:

July 31, 2024

JOHNSON: My grandma brung her friend and her 6yp autistic nonverbal son ans I've been feeling him up all day

Subject-4: Take pics!!!!

Subject-4: Get some video

JOHNSON: I will next time

Subject-4: Dude

JOHNSON: I mean like

JOHNSON: Hes right here but everyone is around

Subject-4: Get some asap don't wait for next time

JOHNSON: So when everyone is gone

JOHNSON: I will

Subject-4: Ok

Subject-4: Tommatrow will never come lol

JOHNSON: Dw

Subject-4: Ok

JOHNSON: [Sends a video that is approximately 14 seconds in length with sound. The video shows a prepubescent male laying on a bed, underneath bedsheets, watching television. An African-American male hand lowers the child's pants and gropes the child's genital area.]¹

JOHNSON: People in the hallway im messing with him under the covers

8. The following conversation took place on August 1, 2024:

Subject-4: Fuck yea perv! Great job. Keep up the good work.

Subject-4: So how far you get w 6 yo? Finger in his ass? Suck his dick? You ever get to play with some 15 shy gamer you was talking about?

JOHNSON: I go to the 15yos house today at 4

Subject-4: Sweet, good luck! Try to get a face pic or anything if poss

6. On or about August 1, 2024, JOHNSON references the video in the

¹ JOHNSON is an African American male.

following text exchange with Subject-4, claiming to have “made” it. Additionally, JOHNSON discusses meeting up with the 15-year-old minor (“this kid”):

JOHNSON: When I made this video I realized something

JOHNSON: Im getting older and I have no excuse to mess with kids like this.

JOHNSON: Im a real fuckin pedophile now

Subject-4: Muhahahaha 🐼🐼🐼🐼

Subject-4: Welcome to the club. Make sure you pick up your complimentary rape kit T the door

Subject-4: Kit at the

JOHNSON: Haha

JOHNSON: Im gonna meet this kid soon i’ll try to not lose myself and get arrested

Subject-4: Lol

Subject-4: Best to just feel him out. See if he’s honry or pervy

JOHNSON: Yeah

JOHNSON: That’s what I was thinkin

9. Additionally, JOHNSON and Subject-4, on multiple occasions, discuss their shared interest in child pornography, possessing child pornography, and what their preferences are when it comes to the type of child pornography they view and possess. For instance, on August 1, 2024, JOHNSON states, “I saw this video of a guy just beating a baby over and over again and I jerked off to it endlessly.” On October 3, 2024, in response to Subject-4’s comment about wanting to see JOHNSON “get all violent and just start beating the [kid]”, JOHNSON replies

“That’s the hottest porn. More than baby rape, abuse in general turns me on so fucking much.”

10. Based on this and other information, I obtained a federal search warrant for JOHNSON, his residence, and his mobile phones and electronic devices. (See 1:25-MJ-260.). The warrant was executed on May 15, 2025.

11. JOHNSON was present at his residence when agents began their search. They detained JOHNSON. Afterwards, he waived his *Miranda* rights, agreed to answer questions, and provided the passcode to a Samsung Galaxy Z Flip 5 phone that was in his possession.

12. Pursuant to the warrants mentioned above, I used the passcode provided by JOHNSON to unlock his phone and manually review content stored on the device. I saw that the messaging application Telegram had been previously installed. When I opened the application, I found multiple videos depicting the sexual abuse of children, many of them infants and toddlers. The files included the following videos:

- a. A video found in the messaging application Telegram. The video was located in the “Saved Messages” folder of the application and appears to have been received by JOHNSON on or about November 8th of

2024.² The video is approximately 1 minute and 16 seconds in length with no sound. The video depicts a female toddler who is naked from the waist down. The child is laying on top of a diaper. An adult male penis vaginally penetrates the child.

- b. A video found in the messaging application Telegram. The video was located in the ‘Saved Messages’ folder of the application and appears to have been received by JOHNSON on or about November 5th. The video is approximately 38 seconds in length with sound. The video depicts a naked female infant who is completely naked. The child is anally penetrated by an adult male penis. The infant can be heard crying during the video.
- c. A video found in the messaging application Telegram. The video was located in the “Saved Messages” folder of the application and appears to have been received by JOHNSON on or about November 3rd. The video is approximately 43 seconds in length with no sound. The video depicts an infant who is completely naked, lying face down on a bed. The infant is anally penetrated by an adult male penis.

² The messages associated with these files indicate they were each received on November 8, November 5, and November 3, respectively. However, the messages do not specify which year. I infer that the year was 2024 based on the recency of other messages in the application, and because this date is consistent with the communications between JOHNSON and Subject 4 related above.

13. I know from my training and experience that Telegram is an application that allows users to communicate over the Internet, typically via a cellular communications network or other wireless internet connection. Necessarily then, a person who receives video messages via Telegram has received this video content using a means or facility of interstate and/or foreign commerce.

14. I also know from my training and experience that Samsung does not manufacture phones in the State of Michigan.

CONCLUSION

15. Based on the information above, I submit there is probable cause to believe that JOHNSON violated 18 U.S.C § 2252A(a)(2) (receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography involving prepubescent minors).

16. I request that the Court authorize the issuance of a criminal complaint and arrest warrant for JOHNSON.